

Subject: DATA PRACTICES ACT REQUEST Re: Questions about AUAR

From: "Carol A. Overland" <overland@legalelectric.org>

Date: 5/15/2025, 11:14 AM

To: Jon Radermacher <cityadmin@cannonfallsmn.gov>, "info@CannonFallsTechnologyPark.com" <info@CannonFallsTechnologyPark.com>

Mr. Radermacher:

I'd sent you an informal request for information a month ago, you'd said you "won't" be able to answer questions, which was rather bizarre as you are the point person on this for the City. You said you'd forwarded it to "the consultants," and I have heard **NOTHING** from "the consultants," nor update from you.

On that note, here's an initial formal **DATA PRACTICES ACT REQUEST as provided by Minn. Stat. Ch. 13**. The City of Cannon Falls is the entity responsible for responding to Data Practices Act Requests. Electronic responses preferred. If a file review would be more convenient, let's arrange it.

At this time I request the following information and any supporting documents that serve as the basis for your response. If there is no information and/or no documentation, please so state:

1. Provide map showing homes within distance increments of 250', 500', 1,000 feet, 1/2 mile, and one mile of the boundaries of the AUAR, with inclusive resident count for each range.
2. Noise - The use of the word "mitigation" in the noise sections implies expected noise exceedences of Minn. R. 7030.0040 standards -- an issue in wind project permitting and operation -- and an issue where I've obtained utility buy-outs for residents inflicted with noise above state standards.
 - a. Provide documentation demonstrating expected operational noise and potential noise mitigation measures, including details of every facility that would be a source of noise.
 - b. Provide basis for assurance in AUAR that every facility would comply with noise standards.
3. Provide documentation of MW load for the data center and other projects in consideration for this area. If multiple buildings/facilities the MW load for each.
 - a. What is the expected range of load -- average and peak -- for each option under consideration.
 - b. What is planned source of electricity, i.e., neighboring gas plant, other source.
 - c. Provide copy of MISO interconnection studies and agreement for any projects requiring grid interconnection.
4. Provide documentation of city's efforts and success in requiring that any energy using facility generate some or all of its own electricity - i.e., cover the facility and surrounding area with solar and batteries. If no efforts made, what will it take to make that happen? A project shouldn't be a drain on the area and it shouldn't be generating additional CO2 via the neighboring gas plant to cover its "high energy use."
5. Provide documentation of volume of expected water use and source for every individual facility under consideration in this AUAR area.
6. Provide copies of any and all Non-Disclosure Agreements executed by any and all city staff and elected officials.
7. Provide copies of any and all land use, zoning, and/or ordinance changes formally or informally under consideration by the City staff, electeds, or city consultants that would have impact on this AUAR area.
8. Provide copy of contract between City of Cannon Falls and project consultant/consultants.

Again, if a file review would be more convenient, please let me know some options of where and when.

Thank you for your consideration,

Carol A. Overland

On 4/14/2025 2:32 PM, Jon Radermacher wrote:

Carol,

I've forwarded your message to the consultants on the project for the AUAR, and they will be providing a response.

I apologize that I won't be able to answer your questions; however, I appreciate your inquiry.

Jon Radermacher

City Administrator



cityadmin@cannonfallsmn.gov

507-263-9304

Peter Drucker: "Management is doing things right; leadership is doing the right things."

From: Carol A. Overland <overland@legalelectric.org>

Sent: Monday, April 14, 2025 1:19 PM

To: Jon Radermacher <cityadmin@cannonfallsmn.gov>; info@CannonFallsTechnologyPark.com

Subject: Questions about AUAR

Howdy!

FULL DISCLOSURE: I am writing this as an individual with utility and land use experience, and I am not representing any client in this matter, have no dog in the fight.

I'm looking at the "**Alternative Urban Area Review (AUAR)**" for which the Scoping comment period closed April 3rd. DRAT! What's the status now? Is the AUAR being drafted as we speak?

Some things jump out at me in the Scoping document.

1. I don't see any reference to residents in the area and there is no map showing homes within, for example, a mile of the boundaries of the AUAR, and no resident count.
2. Noise - I'm concerned about noise as there's no requirement of noise modeling. The use of the word "mitigation" in the noise sections implies noise exceedences of Minn. R. 7030.0040 standards -- an issue in wind project permitting and operation.

Operational Noise

According to the City's Code of Ordinances, noises emanating from any use shall comply with and be regulated by the State of Minnesota pollution control standards and rules.³⁵ As such, all future development will be required to comply with these requirements. The AUAR will include a discussion of operational noise and identify potential operational noise mitigation measures.

3. I hear a lot of comments about "high energy usage" of Data Center but I've not heard specifics. There's no mention in the Scoping document of MW load for the data center. What is the expected range of load -- average and peak?
4. Does Cannon Falls have a requirement that a "high energy user" generate some/all of its own electricity - i.e., cover the facility and surrounding area with solar and batteries? If not, what will it take to make that happen? A project shouldn't be a drain on the area and it shouldn't be generating additional CO2 via the neighboring gas plant to cover its "high energy use."

I'm remembering the Northfield AUAR with a similar proposal (vague, but "industrial," with data center implied), and I'll take a fresh look at that. Also the Hampton one...

Anyway, I'd appreciate answers to the issues I'd raised above. That's all for now!

Carol

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"Our lives begin to end the day we become silent
about the things that matter." Dr. Martin Luther King, Jr.

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